

REMARKS

I. Introduction

In response to the Office Action dated July 6, 2007, claims 3, 4, 6, 7, 10, 11, 13 and 14 have been amended. Claims 3-7 and 10-14 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Drawings

On page (3) of the Office Action, it was indicated that Figures 1 and 2 should be designated with the label "Prior Art," because it is alleged that only that which is old is illustrated.

Applicants' attorney respectfully traverses this requirement by noting that the Sheet Set Manager of the present invention is implemented in the application program 108 (and may be implemented in the operating system 108), and that this functionality is new. Applicants' attorney notes that this new functionality comprising the Sheet Set Manager of the present invention is discussed in conjunction with Figures 1 and 2, and thus Figures 1 and 2 are not illustrating the prior art. Consequently, Applicants' attorney requests that this requirement be withdrawn.

III. Prior Art Rejections

A. The Office Action Rejections

On pages (3)-(9) of the Office Action, claims 3-6 and 10-13 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent 6,466,953 (Bonney) and U.S. Patent Publication No. 2002/0083076 (Wucherer). On pages (10)-(11) of the Office Action, claims 7 and 14 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Bonney and U.S. Patent Publication No. 2003/0031380 (Song).

Applicants' attorney respectfully traverses these rejections.

B. The Applicants' Independent Claims

Independent claims 3, 4, 6, 7, 10, 11, 13 and 14 are generally directed to operating a graphics program in a computer.

Claims 3 and 10 both recite performing one or more functions of a Sheet Set Manager in the graphics program,

(a) wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets

of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, and the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein; and

(b) wherein the Sheet Set Manager is displayed as a window that includes a "Sheet List" tab that provides a user with a "page-by-page" summary of the Sheet Sets, the Subsets of the Sheets contained within the Sheet Sets, and the Sheets contained within the Subsets of the Sheet Sets.

Claims 4 and 11 both recite performing one or more functions of a Sheet Set Manager in the graphics program,

(a) wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, and the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein; and

(b) wherein the Sheet Set Manager is displayed as a window that includes a "View List" tab that provides a method for managing views of the Sheets in the Subsets of the Sheet Sets and the Sheet Sets.

Claims 6 and 13 both recite performing one or more functions of a Sheet Set Manager in the graphics program,

(a) wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, and the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the

Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein; and

(b) wherein the Sheet Set Manager is displayed as a window that includes a "Resource Drawings" tab that provides a method for accessing files underlying the Sheets in the Subsets of the Sheet Sets and the Sheet Sets.

Claims 7 and 14 both recite performing one or more functions of a Sheet Set Manager in the graphics program,

(a) wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, and the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein; and

(b) wherein the Sheet Set Manager allows viewing of the Sheet Sets, Subsets of the Sheet Sets and Sheets as an organized collection of graphical thumbnail previews or properties.

C. The Bonney Reference

Bonney describes an information display device capable of displaying logical display planes includes a first part for storing items of display plane forming information respectively defined for the logical display planes, and a second part for displaying the logical display planes on a screen part in accordance with the items of the display plane forming information, wherein the items of the display plane forming information of logical display planes that have a hierarchical relationship include information describing the hierarchical relationship and commonly own attribute information concerning a component commonly used in the logical display planes having the hierarchical relationship.

D. The Wucherer Reference

Wucherer describes a system and method for linking computer aided design (CAD) elements with non-graphical information within a database. In one embodiment of the method the database

receives and stores first CAD element data generated by a first computer system in data communication with the database. This first CAD element data represents a first CAD element displayable on a monitor of a computer system such as a CAD computer system. Thereafter, a link is created in the database between the stored first CAD element data and one of a plurality of component specifications stored in the database. Each of the plurality of component specifications comprises non-graphical descriptive data that may describe a component of a construction project. In one embodiment, the first computer system is coupled to the database via the Internet. In another embodiment, each of the component specifications include at least one database object.

E. The Song Reference

Song describes a new method and apparatus for visualization and manipulation of real 3-D objects. This new approach utilizes compressed digital video taking advantage of modern video compression technology. The entire system consists of the image acquisition device, the viewing/manipulation program and the 3-D image database. The system first captures images of the object from all possible view angles as a sequence of images (a video). As neighboring images within the sequence will generally be similar, the sequence will be amenable to standard video compression techniques such as MPEG. The acquired video data (rendition of a real 3-D object) is then stored into a database for later access, for instance, over the Internet. Through specially developed software, the stored data can be manipulated while viewing the object. The user simply inputs—via a mouse, for instance—the view angle and the software automatically displays the appropriate frame within the video (stored data). The software allows various object manipulations such as rotation in arbitrary direction, as well as zoom, pan, etc. A particular implementation of the viewing program using a Pentium III processor, randomly accessing an MPEG sequence, through pre-decoding of certain anchor frames, is able to decode fast enough for users to perform real-time manipulation of the object. The captured 3-D image data of an object is stored into a centralized (or distributed) database and users may access the data through the assigned URL for the object over the Internet. The data may or may not be password protected. As such, the overall system is an implementation of a one-stop service for individuals wishing to provide 3-D visualization of real 3-D objects over the Internet.

F. The Applicants' Invention is Patentable Over the References

The Applicants' invention, as recited in amended independent claims 3, 4, 6, 7, 10, 11, 13 and 14, is patentable over the combination of Bonney and Wucherer, as well as the combination of Bonney, Wucherer and Song, because it recites a specific combination of elements not shown by the references.

The Office Action, on the other hand, asserts that all the elements of independent claims 3, 6, 7, 10, 11 and 13 are shown in the combination of Bonney and Wucherer and that all the elements of independent claims 4 and 14 are shown in the combination of Bonney and Song.

However, Applicants' attorney asserts that, when placed in context, each of these combinations teach something different than Applicants' inventions.

1. Bonney does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets, and Sheets as recited in independent claims 3, 4, 6, 7, 10, 11, 13 and 14.

The Office Action asserts that Bonney teaches a CAD program capable of performing the functions of a Sheet Set Manager. At the locations indicated by the Office Action, however, Bonney merely describes drawings generally, where a drawing may include views and may be comprised of multiple sheets.

Bonney does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

For example, the hierarchical relationship shown in FIG. 2 of Bonney refers to relationships between sheets, i.e., each icon 200-218 in FIG. 2 is a sheet. However, there is no recognition in Bonney of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification, nor is there any recognition in Bonney of the hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

2. Wucherer does not describe a "Sheet List" tab as recited in independent claims 3 and 10.

The Office Action admits that Bonney does not teach a "Sheet List" tab, but asserts that Wucherer does teach these claim elements. At the locations indicated by the Office Action, however, Wucherer merely describes a CAD object manager that shows the attributes of a single object, not a "Sheet List" tab.

Wucherer, like Bonney, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, like Bonney, there is no recognition in Wucherer of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification, nor is there any recognition in Wucherer of the hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

Consequently, Wucherer does not teach or suggest displaying a window that includes a "Sheet List" tab that provides a user with a "page-by-page" summary of the Sheet Sets, the Subsets of the Sheets contained within the Sheet Sets, and the Sheets contained within the Subsets of the Sheet Sets.

3. Wucherer does not describe a "View List" tab as recited in independent claims 4 and 11.

The Office Action admits that Bonney does not teach a "View List" tab, but asserts that Wucherer does teach these claim elements. At the locations indicated by the Office Action, however, Wucherer merely describes a CAD object manager that shows a Details button that expands the CAD Object Manager and display information for a single CAD object, not a "View List" tab.

Wucherer, like Bonney, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and

each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, like Bonney, there is no recognition in Wucherer of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification, nor is there any recognition in Wucherer of the hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

Consequently, Wucherer does not teach or suggest displaying a window that includes a "View List" tab that provides a method for managing views of the Sheets in the Subsets of the Sheet Sets and the Sheet Sets.

4. Wucherer does not describe a "Resource Drawings" tab as recited in independent claims 6 and 13.

The Office Action admits that Bonney does not teach a "Resource Drawings" tab, but asserts that Wucherer does teach these claim elements. At the locations indicated by the Office Action, however, Wucherer merely describes a CAD object manager that shows a Details button that expands the CAD Object Manager and display information for a single CAD object, not a "Resource Drawings" tab.

Wucherer, like Bonney, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, like Bonney, there is no recognition in Wucherer of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification, nor is there any recognition in Wucherer of the hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

Consequently, Wucherer does not teach or suggest displaying a window that includes a "Resource Drawings" tab that provides a method for accessing files underlying the Sheets in the Subsets of the Sheet Sets and the Sheet Sets.

5. Song does not describe allowing the viewing of the Sheet Sets, Subsets of the Sheet Sets and Sheets as an organized collection of graphical thumbnail previews or properties as recited in independent claims 7 and 14.

The Office Action admits that Bonney does not teach allowing the viewing of the Sheet Sets, Subsets of the Sheet Sets and Sheets as an organized collection of graphical thumbnail previews or properties, but asserts that Song does teach these claim elements. At the locations indicated by the Office Action, however, Song merely describes an image editor that displays multiple thumbnail images.

Song, like Bonney, does not describe a Sheet Set Manager that manages Sheet Sets, Subsets of the Sheet Sets and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets of the Sheets, each of the Subsets of the Sheets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, such that the Sheet Set Manager displays a logical structure for the Sheet Sets, the Subsets of the Sheet Sets and the Sheets on the computer as a hierarchical tree representation of the Sheet Set that shows the Subsets of the Sheet Sets contained therein as well as the Subsets of the Sheet Sets that show the Sheets contained therein.

Indeed, like Bonney, there is no recognition in Song of the concept of Sheet Sets or Subsets of Sheet Sets, as those terms are defined in Applicants' claims and specification, nor is there any recognition in Song of the hierarchical relationship between Sheet Sets, Subsets of Sheet Sets, and Sheets.

Consequently, Song does not teach or suggest viewing of the Sheet Sets, Subsets of the Sheet Sets and Sheets as an organized collection of graphical thumbnail previews or properties.

6. Summary.

In summary, Applicants' attorney submits that independent claims 3, 4, 6, 10, 11 and 13 are allowable over Bonney and Wucherer, and that independent claims 7 and 14 are allowable over Bonney and Song. Further, dependent claims 5 and 12 are submitted to be allowable over Bonney and Wucherer in the same manner, because they are dependent on independent claims 4 and 11,

respectively, and thus contain all the limitations of these independent claims. In addition, dependent claims 5 and 12 recite additional novel elements not shown by Bonney and Wucherer.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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